## EXHIBIT C

MAUREEN FRANGOPOULOS DECLARATION ISO DEFENDANTS' MARCH 10, 2025 BRIEF PURSUANT TO SPECIAL MASTER ORDER NO. 2, § III(6)

Case No. 3:23-MD-3084-CRB

## **DECLARATION OF MAUREEN FRANGOPOULOS**

I, Maureen Frangopoulos, having personal knowledge of the following state:

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1. I am the Senior Legal Director, Central Strategy and Special Matters, Global, at Uber. I was first employed by Uber in August 2015 and I have worked as an in-house legal counsel for the past 9 years. My previous positions at Uber included Counsel, Insurance; Senior Counsel, Insurance; Director, Safety & Insurance; Senior Legal Director, Safety and Insurance Litigation, U.S. and Canada; and Senior Legal Director, Global Safety & Insurance Litigation. For my entire tenure at Uber my job roles in these positions were in a capacity to provide legal advice to Uber and its employees. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 10, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. reviewed identified privilege Ι the document in the log as JCCP MDL PRIVLOG025436. It is a confidential and privileged draft document authored in 2018 by Claire Eagan, former Senior Counsel, Safety and Insurance Litigation, High Exposure, US Northeast. Other in-house counsel and legal personnel were collaborators on this document, including then-Head of Legal, Safety & Insurance, Kathleen Waitzman, then-Senior Counsel, Safety & Insurance, Rebecca Remington, then-Senior Counsel, Safety & Insurance, Stephanie Vitale, then-Senior Counsel, Safety & Insurance, Joshua Wolkomir, then-Senior Counsel, Safety & Insurance, Christina Linsmeier, then-Senior Global Special Investigations Claims Advocate, Mike Haas, and myself. Indeed, the document contains a comment by Ms. Waitzman. The document contains legal advice and analysis in anticipation of litigation relating to riders interviewed by Megyn Kelly.

I declare under penalty of perjury that the foregoing is true and correct.

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